



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 17 1999

OFFICE OF
CIVIL RIGHTS

Dr. Joan M. Daisey
Chair, Executive Committee
Office of the Science Advisory Board
U.S. Environmental Protection Agency (MC-1400)
401 M Street, S.W.
Washington, DC 20460

SUBJECT: Science Advisory Board (SAB) Report - Review of Disproportionate Impact
Methodologies; Report Number EPA-SAB-IHEC-99-007

Dear Dr. Daisey:

Thank you for the comments and recommendations contained in your December 4, 1998, letter to the United States Environmental Protection Agency Administrator (EPA) Carol Browner and the accompanying report, *An SAB Report: Review of Disproportionate Impact Methodologies* (EPA-SAB-IHEC-99-007). The Office of Civil Rights (OCR) appreciates the Integrated Human Exposure Committee's (IHEC) timely review of the proposed methodologies for calculating disproportionate or disparate impacts of air emissions on surrounding populations of different race, color, or national origin. Several of the SAB recommendations have already been incorporated into the disparate impact methodology used by OCR for investigation of complaints filed under Title VI of the Civil Rights Act of 1964, as amended (Title VI).

Enclosed please find responses addressing the IHEC's nine specific recommendations for conducting disparate impact analyses. We plan to continue to work with various program offices including the Office of Air and Radiation, Office of Research and Development, and the Office of Policy (now the Office of Policy and Reinvention) to further improve the methodologies for calculating adverse disparate impacts of air emissions, as the state-of-the-science allows. Again, we thank you for the time and effort involved in your review. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann E. Goode".

Ann E. Goode
Director

Enclosure